

July 20, 2017

Ms. Marlene H. Dortch, Secretary
Office of the Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

RE: Technology Transitions, GN Docket No. 13-5
Restoring Internet Freedom, WC Docket No. 17-108
Accelerating Wireline Broadband Deployment by Removing Barriers to
Infrastructure Investment, WC Docket No. 17-84
Accelerating Wireless Broadband Deployment by Removing Barriers to
Infrastructure Investment, WT Docket No. 17-79
Connect America Fund, WC Docket No. 10-90
Universal Service Reform - Mobility Fund, WT Docket No. 10-208
Lifeline and Link Up Reform and Modernization, WC Docket No. 11-42
Telecommunications Carriers Eligible for Universal Service Support,
WC Docket No. 09-197

Dear Ms. Dortch:

On July 18, 2017, county commissioners and administrators from eleven counties in Ohio - Guernsey County, Meigs County, Monroe County, Athens County, Vinton County, Hocking County, Harrison County, Muskingum County, Tuscarawas County, and Washington County - along with Kate Forsey, Associate Policy Counsel from Public Knowledge, met together with Commissioner Mignon Clyburn and Chief of Staff to the Commissioner David Grossman as part of the Appalachian Connectivity Summit in Marietta Ohio to discuss the systemic problems with communications networks that continue to devastate Ohio communities. A full list of attendees' names is attached to this submission.

Each county delegation spoke on behalf of that county alone, and the details of their concerns are detailed by county below. However, several themes emerged during the conversation which are important to highlight. They include a lack of reliability on legacy telephone networks; emergency services downed for extended periods of time; negative effects on primary and secondary education; the impact lack of access has on families with disabilities; the inability for small businesses to flourish and impact on the local economy and jobs; geographical barriers to access; and, where access exists, the unaffordability of those services, misrepresentation of actual service speed versus what was advertised, and lack of choice and competition.

Guernsey County

Commissioners expressed deep concern not only about wireline broadband but lack of reliable mobile access as well. Guernsey County has large black holes in its mobile connectivity. They would like

to see a synergy where they can see the unserved communities served, particularly in the northeast corners. They emphasized that it is becoming more dire as more and more people eliminate wireline service and prefer to use wireless. In addition, for individuals whose jobs require them to spend a lot of time on the road, that lack of mobile access presents serious public safety concerns. Even the pagers emergency responders use often do not work in many areas. With low band access being phased, the community is working on transitioning to more high band paging.

Meigs County

The representative from Meigs County was not a Commissioner but a community organizer. She noticed that her connection was being throttled by her provider, Frontier, and started asking her fellow residents if they experienced the same problems. Many of them not only experience throttling, but serious lack of connectivity overall. Law enforcement officials expressed concern for their personal safety, citing potential circumstances where if they were injured in a valley, they would likely not make it to the top of the hill where they could radio for assistance before they expired. This was a recurring theme. The lack of broadband access also makes it difficult for students to do their homework, with many having to graduate late because they fail to complete requirements for course credits.

Meigs County also has serious landline reliability problems. One resident is a closed captioner for television stations, and when his landline fails, he is not compliant with FCC requirements. The resident's wife is deaf and was offered a video phone device, but the couple found it was useless to them because they lack the bandwidth for it to operate. They implored the FCC to take these challenges into account when moving forward on decisions related to landlines, broadband, and spectrum.

Monroe County

Monroe County is not dissimilar to many of the other counties represented - it is very large geographically but with a small population, averaging 32 people per square mile. Coal mining and gas are a principal component of the economy, and despite conventional wisdom, rely heavily on access to be successful. The coal, oil, and gas companies residents rely on for their livelihoods are globally connected, and communications facilities that can connect Monroe County to others around the world are essential to maintaining those jobs.

When asked about statistics for economic losses from poor broadband access, Monroe Commissioners emphasized that it's difficult to quantify, because they cannot know what opportunities they missed out on. Looking beyond those numbers, however, they do know that healthcare and other service sectors continue to struggle, because people are increasingly reluctant to come to or stay in a region that is increasingly lagging behind the rest of the country where access is involved.

Commissioners express their concern that they have difficulties using telehealth services. Monroe County is one of the few counties without a hospital. The closest hospital is thirty minutes away from most residents, and lacks a trauma center. The closest hospital with a trauma center is more than an hour from most residents. The county would benefit tremendously from telehealth initiatives, but lack of access makes it nearly impossible in most cases. In Monroe County, as in other rural areas, the lives that could be best helped by telehealth because of their distant location are also the ones who are most likely to lack access to it.

Athens County

Lack of access results in economic devaluation for Athens County. Commissioners described the inability for residents to find or apply for jobs. Lack of access also devalues homes, as broadband is one of the amenities potential buyers consider when they pay for homes. Within the municipality, a home without broadband access does not just itself depreciate, but homes nearby as well. Even within areas where there is some access, it's often prohibitively expensive, forcing families to choose between internet access and other necessities. One commissioner described a brother-in-law who is disabled and lives on social security, yet pays \$140 per month for an internet bundle.

Athens County also has a great deal of dark fiber running unused beneath it. Internet connections run beneath homes connected only to anchor institutions like schools and libraries but providing nothing to the families in between. Schools provide computers to their students, but the students cannot use them at home.

Commissioners implored the FCC to focus on users and not just the provider end of the equation when making decisions about improving broadband in America. When programs are designed, there is a need to provide better data about where there is access, where there is availability for access that is underutilized, because the current maps provided to policymakers do not reflect the realities on the ground. There also needs to be an effort to make access more affordable where it does exist.

One Commissioner explained how when Verizon bought AllTel, his AllTel connection at home ceased to operate. By good fortune, he happened to have a meeting in the course of his job with a Verizon executive, who offered to ping his tower to another and fix his connectivity. He reflected on his luck because when he could not get the problem fixed through customer service, he “happened to know somebody up the chain.” That should not be how unsatisfactory broadband access gets resolved in 2017.

Economic opportunities are where the broadband is. Athens has a large food network that is very well-developed and expanding in the region, but when they look to ship to new markets in other parts of the country, they cannot get online to do so. Expansion of businesses and jobs suffer where access is lacking.

Vinton County

Vinton County's economy is reliant on start-ups, small businesses, and its tourism industry. Tourists come to enjoy nature or stay in converted castles out in the wilderness, but still want to be connected. Local entrepreneurs find it difficult to satisfy that need for internet and it hurts their draw with potential customers.

Vinton County's commissioners recognize there are geographical impediments in addition to the problems they face with provider reluctance. The region comprises many “hills” and “hollows, and the hollows cannot get line of sight. They urged the FCC to help think creatively with them and technologists about how to solve this problem in rural America. They emphasized that the government was created to do the things that private companies will not do, and refused to apologize for using the government to “get the services our neighbors need to them.”

There is a problem with perception, they concluded. There is a need to stop thinking about internet access as something that is needed purely for entertainment purposes. The commissioners believe

it has become a public utility like rural electric once became, and that if it takes new deals like the ones the country saw to get electricity to rural America, then that is what should happen.

Hocking County

Hocking County began a one-to-one initiative several years ago. There is now a laptop in the hands of every student between grades 7 and 12. The use of that tool to the students stop when that student walks out the door at the end of the day because their homes are unconnected.

Commissioners voiced frustration that Frontier took stimulus monies to improve connectivity in the county. A lot of promises were made and so far Frontier has not delivered. Hocking County still does not meet the definition of broadband in the majority of their homes. They urged the FCC to hold service providers accountable when they take money from the government but subsequently fail to follow through on providing the infrastructure they promise. They believe that there is a capability to put funding to good use to provide better infrastructure, but that it requires oversight to ensure those dollars are being spent, and are being spent where and how they need to be.

Harrison County

Like other counties, Harrison County is frustrated that the data that says they are connected is wildly inaccurate. Students are encouraged in digital literacy and use e-docs in school but they become useless to them at home. As with Hocking County, they are dismayed at watching fiber laid down that never reaches end users, and at the lack of accountability when it comes to stimulus usage. They argue that no taxpayer has benefited from those dollars; only anchor institutions.

One of the commissioners, also a postmaster, made the case that the county would benefit from the online shopping connectivity would encourage in its residents, because it would increase the sales tax being brought into the county and bring more retail into the community.

Muskingum County

What access exists in Muskingum County is similarly unreliable. Schools frequently lose signal for over an hour, often making it impossible for students to do their work and leading to backlogs of assignments. In order to get mobile signal, residents often have to climb to the tops of nearby hills and hold their mobile devices in the air.

Landline connections are suffering as well. The local provider, AT&T, is removing landlines or letting them fall into disrepair, so many residents have to drive away from their homes towards town to call emergency services. They urge the FCC to help them have conversations about local solutions to provide connections to communities, perhaps through the formation of rural community cooperatives.

Tuskarawrus County

The delegation from Tuskarawrus County echoed the concerns of the counties that spoke before them. They also noted that they are towards the end of life on their 911 system. By the end of the year,

they will need to redo their radio towers or sign up with a new system, burdens their community is not yet prepared for.

Washington County

Washington County faces fewer problems within the towns than many of the other counties. However, once outside towns like Marietta, OH, they face the same problems as the other counties. One commissioner also runs a small ISP and emphasized the need for more funding for small competitors to build infrastructure to provide Wi-Fi to residents where big companies like Verizon fail to do so. He also discussed the problem he faces with backhaul from Verizon, where he must pay \$2000 a month. Small wireless ISPs need at least 200 customers to make the business case for that, and they cannot accomplish that without the infrastructure necessary, so he implored the FCC to find a way to provide subsidies. Washington County also displayed an interest in the idea of partnerships, where companies could pool money to provide deployment together.

Commissioners from the above counties brought these stories from their residents to implore the FCC to aid their community efforts to improve broadband and landline access, speed, reliability, and affordability in West Virginia. The data currently used by the FCC clearly does not reflect the actual experiences of residents in these counties. Improving broadband in West Virginia and across Appalachia is an absolute necessity for public safety, economic growth, and improved quality of life in the region. It is a matter of life and death.

In accordance with Section 1.1206(b) of the Commission's rules, an electronic copy of this letter is being filed in the above-referenced docket. Please contact me with any questions regarding this filing.

Sincerely,

Kate Forsey
Associate Policy Counsel
Public Knowledge

cc: Commissioner Mignon Clyburn
cc: David Grossman

Attachments:

Full list of Attendees By Name and Position
Roane County Commissioner Letter
Service Survey from Wetzel County